

SURREBUTTAL TESTIMONY

OF

ALCINDA JACKSON

CONSUMER SERVICES DIVISION  
ILLINOIS COMMERCE COMMISSION

I.C.C. DOCKET NO. 00-0596

December 21, 2001

1     **I.       Introduction**

2     **Q.       Please state your name and business address.**

3     A.       My name is Alcinda Jackson, and my business address is 527 East Capitol Avenue,  
4             Springfield, Illinois.

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6     **Q.       Are you the same Alcinda Jackson that previously testified in this docket?**

7     A.       Yes.

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9     **Q.       What is the purpose of your testimony?**

10    A.       The purpose of my rebuttal testimony is to respond to certain arguments made in  
11    the rebuttal testimony of: 1) Karen Boswell, representing Verizon North, Inc. and  
12    Verizon South, Inc. ("Verizon"), concerning the elimination of exception reporting  
13    requirements in response to the implementation of the quarterly reporting requirements;  
14    and 2) Charlotte TerKeurst, representing the Citizens Utility Board ("CUB") and the  
15    People of the State of Illinois ("AG"), concerning annually averaging the percentage of  
16    repeat trouble reports in response to Reply Testimony submitted by Citizens witness  
17    Ruhland.

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19    **II.       Section 730.115 Reporting**

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21    **Q.       On page 27 of Verizon witness Boswell's rebuttal testimony, she claims**  
22    **that the exception reporting and the quarterly reporting required by HB 2900 pose**  
23    **a regulatory burden on carriers, that both forms of reporting cannot reasonably**

**be expected to have an effect on a carrier's service quality, and recommends that exception reporting should be eliminated. Does Staff agree with her recommendation?**

A. No, the quarterly reports (Section 730.115) and exception reports (730.510, 730.515, 730.535, 730.540) serve different purposes, and are not unduly burdensome to carriers. It is Staffs' desire that all carriers exceed the standards of Part 730, and therefore never be required to submit an exception report. That being said, the importance of exception reporting exceeds the burdens it places upon the carriers. A carrier must only generate an exception report when it misses a service quality benchmark. The exception report enables Staff to monitor telecommunication carrier's service quality, to determine if the problem needs to be immediately addressed, and to work with the carrier to implement change(s) so as to improve the service quality of the carrier for Illinois' consumers.

The quarterly reports serve a different function, but are just as important. The quarterly reports provide the Commission, Commission Staff, legislators, and consumers with a statewide snapshot of service quality. Staff will receive and post these quarterly reports prepared by the carriers to the Commission's web site. In essence, the public posting of the quarterly reports could be viewed, to the extent the reports reflected favorably on the carrier, as a marketing tool to promote the carriers service, and possibly promote competition. Consequently, the public posting of the quarterly reports provides an incentive for a carrier to strive to meet the requirements.

In summary, the two reporting requirements are not similar and produce different

desired results, thus the requirements in Staff's proposed rule for exception reporting and quarterly should remain.

**III. Section 730.545(i), Trouble Reports**

**Q. On pages 3 and 4 of her rebuttal testimony, CUB/AG witness TerKeurst responds to Citizens' witness Ruhland reply testimony recommending that the percentage of repeat trouble reports be measured on an annual basis rather than monthly. Does Staff concur with the arguments presented by CUB/AG witness TerKeurst?**

A. Yes, Staff agrees with the arguments made by CUB/AG witness TerKeurst on pages 3-4 of her testimony. Ms. TerKeurst is correct in stating that there will be month-to-month variations in the actual measurements of service quality standards. Aggregating a service quality standard over a year only benefits the carrier, not the consumer. Aggregating provides a carrier with the ability to not consistently provide adequate service, by being able to miss the benchmark a few months, and/or meet, or barely exceed, the standard for a few months and still meet the benchmark for the year. Therefore, Staff agrees with CUB/AG, that repeat trouble reports should not be provided on an annual basis, and recommends that the Commission reject Citizens' proposed revisions to Section 730,545(c), Trouble Reports.

**Q. Does this conclude your testimony?**

A. Yes, it does.

